

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT SYSTEMS, LLC,        )  
    )  
    )  
Plaintiff,                                  )  
    ) CIVIL ACTION NO.:  
v.    ) 1:24-CV-00246-CEA-CHS  
    )  
QUALTIM, INC., et al.,                    )  
    )  
Defendants.                                )

**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS' REPLIES TO  
PLAINTIFF'S RESPONSES TO MOTIONS FOR LEAVE TO FILE DOCUMENTS  
UNDER SEAL**

Defendants filed a Motion To Seal Exhibits A and C through I to the Amended Complaint on May 23, 2025. *See Doc. 74.* On June 6, 2025, Plaintiff filed a Response opposing the motion. *See Doc. 76.* Pursuant to Local Rule 7.1, Defendants' Reply was due on June 13, 2025. Defendants inadvertently failed to file a reply and hereby move for an extension of time to file their reply until June 27, 2025.

In this regard, another case between the parties is currently pending in the United States District Court for the Western District of Wisconsin with Case No. 3:25-cv-00075-wmc. The Defendants in this case are Plaintiffs in that case, and had responses to three motions to dismiss due on June 13, 2025. Unfortunately, in the work to prepare the responses to the three motions to dismiss, Defendants inadvertently failed to prepare the reply due in this case. Also, lead counsel for the Defendants – May La Rosa – is out of the office this week and unable to work on the reply until next week.

Additionally, Defendants filed a Motion to Seal Other Exhibits on June 3, 2025. *See Doc. 75.* Plaintiffs filed a Response in opposition to the motion on June 16, 2025. *See Doc. 77.* As noted, lead counsel for the Defendants is out of the office this week and unable to work on the

reply. Accordingly, Defendants also respectfully request an extension until June 27, 2025, to reply to the response to the second motion to seal.

Defendants' counsel has conferred with Plaintiff's counsel, who represented that Plaintiff do not oppose the extensions sought by this motion.

In view of the above, Defendants move for an extension until June 27, 2025 to file replies to the responses in opposition to both motions to seal. The present request is not offered for the purpose of delay or advantage.

Respectfully submitted,

LUEDEKA NEELY, P.C.

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## CERTIFICATE OF SERVICE

I hereby certify that on the 16<sup>th</sup> day of June 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/Michael J. Bradford  
Michael J. Bradford  
*Attorney for Defendants*